



ETHICAL TRADING, MODERN SLAVERY AND ANTI HUMAN TRAFFICKING POLICY

OBJECTIVE

ETI Ltd seeks to ensure that its products are manufactured to the highest technical and ethical standards by providing high standards of working conditions in its own factories and by developing long term trading relationships with suppliers.

ETI Ltd complies with and takes all reasonable steps to ensure suppliers comply with the Modern Slavery Act of 2015, and to follow its Code of Conduct based on the code developed by the Ethical Trading Initiative (ETI), which is an alliance of companies, non-governmental organisations and trade union members who are working towards worldwide ethical standards of trading. Whilst ETI Ltd is not a full member of the Ethical Trading Initiative alliance, ETI Ltd fully endorse their principles.

As well as the ETI Code of Conduct detailed below, the company confirms its support of and compliance with the Modern Slavery Act 2015, and a copy of this policy may be found on the ETI Ltd website or obtained from sales@etiltd.com

The company is committed to bringing about positive improvements to international standards in conditions for workers in all organisations across the globe.

CODE OF CONDUCT

ETI Ltd will endeavour at all times to act in a responsible way towards the world and its people, and takes all reasonable steps to ensure our suppliers and our customers do the same, by:

- Respecting the economic, social, cultural, political, and civil rights of those involved in our operations.
- Complying with all local human rights legislation
- Implementing programmes across our whole operation, together with our supply chain partners and the use of an approved supplier's system.
- Ensuring all workers employed by ETI Ltd are document checked to ensure there are no legal or other conflicts of interest.

PERSONNEL RIGHTS AND DIGNITY AT WORK

- Precluding the use of forced labour, including child labour.
- Providing comprehensive company policies and mutually agreed terms and conditions. This includes meeting local minimum legal wage levels, or if no legal minimum, that wages are aligned with the local sector wage.
- Ensuring that young persons are employed in circumstances protecting them from physical, mental, or moral well-being risks and education disruption.
- Not tolerating any form of harassment in the workplace (see separate policies).
- Providing freedom of association and collective bargaining via employee communications policy.
- Considering the needs of disabled people.
- Ensuring employees are able, subject to giving reasonable notice in accordance with local law or collective agreement, to terminate their employment.
- Not withholding identity or immigration documents from workers.



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HEALTH AND SAFETY IN THE WORKPLACE

- Creating a healthy and safe work environment for each employee.
- Having company policies in place on Health & Safety, company & employee responsibilities, accident reporting, safety training, risk assessments, etc.
- Giving fair remuneration.
- Ensuring working hours and remuneration are reasonable and comply with local legislation and when appropriate are comparable to those offered by similar local companies.

DIVERSITY AND RESPECT FOR DIFFERENCES

- Managing diversity to promote and capitalise on cultural and individual differences to create competitive advantage through new perspectives and local market sensitivity.

OPPORTUNITY FOR DEVELOPMENT

- Recognising the value that employees create and rewarding them with opportunities for personal and career development and providing equal opportunities regardless of gender, age, marital status, sexual orientation, disability, or medical status, family status, race, religion or national origin.
- Encouraging its employees to aid the company to comply with the above with a specific “Whistle-blowing” policy to enable poor practice to be brought to the attention of senior management, and the company would welcome any information on this subject from either its customers or suppliers.

If the Modern Slavery policy or the above principles have been disregarded, the matter shall be discussed by the Directors and actions decided, with possible formal disciplinary action for employees, sanctions against contractors or suppliers, and possible reporting to authorities in any event. Any such actions will be documented.